

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA) No. 1:04cr421
)
v.) Conspiracy to Commit Immigration
	Fraud
NARAN S. IVANCHUKOV,) and False Statements (18 U.S.C. §
(Counts 1-68, 70)	371)
) Count 1
GEORGE TSUI,)
(Counts 1-48)) Conspiracy to Encourage an Alien to
	Unlawfully Enter the United States
REX B. WINGERTER,) (8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(1))
(Counts 1-48, 69)) Count 2
)
MICHELLE I. PAPPADAKIS,) Immigration Fraud (18 U.S.C. §
a/k/a Michelle Ivanchukov,	1546(a))
(Counts 1-68, 70)) Counts 3 through 48
)
BEMBA BALSIROV,) Conspiracy to Commit Money
a/k/a Bemba Balsirow,	Laundering
(Counts 1-27)) (18 U.S.C. § 1956(h))
) Count 49
ROBERT J. MAHOOD,)
(Counts 1-27)) Money Laundering (18 U.S.C. §
	1956(a))
ALICE JIA,) Counts 50 through 68
a/k/a Hong Li Jia,)
(Counts 1-27, 48)) Misprision of Felony (18 U.S.C. § 4)
) Count 69
Defendants)
) Conspiracy to Defraud the United
	States
) (18 U.S.C. § 371)
) Count 70
)
) Forfeiture

SUPERSEDING INDICTMENT

March 2005 Term - At Alexandria

GENERAL ALLEGATIONS

THE GRAND JURY CHARGES THAT:

At all times material to this Superseding Indictment:

The Defendants and Co-Conspirators

1. Defendant NARAN S. IVANCHUKOV was the owner and president of Global Recruitment and Immigration Services, Inc. (“Global”). Global was located at 6521 Arlington Boulevard, Suite 400, Falls Church, Virginia, in the Eastern District of Virginia. A substantial part of Global's business involved assisting aliens who were seeking permanent residence in the United States to obtain “green cards” through an employment-based visa program. Global was incorporated on or about October 8, 1998, under the name of International Resources & Technologies, Inc. (IRT). On or about February 23, 2000, IRT changed its name to Global Recruitment and Immigration Services, Inc. During the course of the crimes alleged below, Global had revenue of approximately \$3.2 million.

2. Defendant GEORGE TSUI was the owner of U.S. Eagle, Inc. TSUI and U.S. Eagle, Inc., worked with recruiters in China and the United States to find Chinese aliens seeking to enter and remain in the United States. TSUI and U.S. Eagle charged these aliens tens of thousands of dollars to obtain fraudulent employment-based visas and green cards through Global. TSUI shared the money he received from these aliens with IVANCHUKOV. During the course of the crimes alleged below, U.S. Eagle, Inc., had revenues of approximately \$1.3 million.

3. Defendant REX B. WINGERTER was employed by Global and served as Global's in-house attorney. WINGERTER is licensed to practice law in the District of Columbia and the State of Maryland.

4. Defendant MICHELLE I. PAPPADAKIS, a/k/a Michelle Ivanchukov, was the vice president of Global and was the daughter of defendant IVANCHUKOV.

5. Defendant BEMBA BALSIROV, a/k/a Bemba Balsirow, was the nephew of defendant IVANCHUKOV.

6. Defendant ROBERT J. MAHOOD was a manager of East Coast Fabricators, Inc., a company in Winchester, Virginia, that manufactured aluminum framed window panels for installation in commercial buildings.

7. Defendant ALICE JIA, a/k/a Hong Li Jia, was an employee of U.S. Eagle, Inc.

8. Paul V. Mederos, a co-conspirator, was a manager of Cleaners of America, a company with offices in Alexandria, Virginia, that provided janitorial services in Northern Virginia and elsewhere.

The Labor Certification Process

9. The Virginia Employment Commission was an agency of the government of the Commonwealth of Virginia and maintained offices in Alexandria and Richmond, Virginia, in the Eastern District of Virginia.

10. The Maryland Department of Labor Licensing and Regulation was an agency of the government of the State of Maryland and maintained offices in Baltimore, Maryland.

11. The Alien Labor Certification Unit of the New Jersey Department of Labor was an agency of the government of the State of New Jersey and maintained offices in Trenton, New Jersey.

12. The Department of Labor, the Immigration and Naturalization Service (INS), the Department of Homeland Security, and the Department of State were agencies within the executive branch of the government of the United States.

13. An alien seeking to immigrate to the United States could apply for an immigrant visa to perform skilled or unskilled labor in the United States. If approved, this employment-based visa allowed the alien to come to the United States and to apply for lawful permanent residence in the United States.

14. In order to receive an immigrant visa to perform skilled or unskilled labor in the United States, the alien first had to obtain a formal certification from the Secretary of Labor that there were insufficient U.S. workers willing and qualified to perform the labor in question and that the employment of the alien would not adversely affect the wages and working conditions of U.S. workers similarly employed.

15. An essential requirement of the labor certification process, therefore, was for the employer to demonstrate that there were no current U.S. workers willing and able to fill the vacant position. One means an employer could fulfill this requirement was by demonstrating that notices were posted at the job site and advertisements were placed in local newspapers and by certifying either that no U.S. workers responded to the notices and advertisements or that the ones who did were not qualified. If an applicant was found not qualified, the employer was required to explain why the applicant did not meet the qualifications of the position.

16. To obtain a labor certification, the alien's prospective employer had to file an Application for Alien Employment Certification, officially known as a form ETA 750, with the United States Department of Labor. This application had to be completed and signed under penalty of perjury by both the prospective employer and the alien. In part A of the application, the employer represented that the employer had a specific job to fill; described the nature, location, terms, and requirements of the job; and listed the name, address, and immigration status of the alien seeking the job. The employer also certified that the job opportunity had been and was at the time of filing clearly open to any qualified U.S. worker. In part B of the application, the alien listed his name, address, biographic information, and immigration status; described his experience and qualifications for the job the employer was offering; and represented that he was willing and qualified to accept the job.

17. Once the application was signed and completed, the alien's prospective employer had to file the application with a state employment agency. In Virginia, this agency was the Virginia Employment Commission (VEC); in Maryland, it was the Department of Labor Licensing and Regulation (DLLR); and in New Jersey, it was the Alien Labor Certification Unit of the New Jersey Department of Labor. The state employment agency reviewed the application for completeness, ensured that the employer was offering the prevailing wage for the job listed in the application, and oversaw any recruiting and advertising the employer might be required to do as part of the certification process. Once the state agency completed this portion of the certification process, the agency forwarded the application to the appropriate United States Department of Labor regional office for final determination. The regional office reviewed the

application and then either issued a final certification on behalf of the Secretary of Labor or denied the application.

18. If the Department of Labor approved the application and issued a certification, the alien's prospective employer could then file on the alien's behalf an Immigrant Petition for Alien Worker, officially known as a form I-140, with the Immigration and Naturalization Service or, after March 1, 2003, when it took over the functions of the INS, with the Department of Homeland Security. If approved, this petition resulted in the issuance of an immigrant visa to the alien and allowed the alien to immigrate to the United States and to apply for lawful permanent residence upon arrival.

19. Both the alien and the prospective employer could engage an attorney to represent their respective interests during the application process for labor certification. If the alien or the prospective employer engaged an attorney, however, the attorney had to sign and file a notice of appearance with the Department of Labor on an INS form G-28 that specifically named the attorney's client or clients.

20. In certain circumstances, an alien already in the United States who wished to stay in the United States as a lawful permanent resident could do so by applying for a labor certification following the process described above. If the Department of Labor approved the certification, the alien's prospective employer could then file an I-140 on the alien's behalf. If the INS approved the I-140 and the alien was in the United States lawfully at that time, the alien could then adjust his status to that of a lawful permanent resident by filing an Application to Register Permanent Residency or Adjustment of Status, officially known as INS form I-485, with the INS. An alien unlawfully in the United States could also use an approved I-140 to

adjust his status to that of a lawful permanent resident by filing an I-485 with the INS, but only if the alien's prospective employer applied for the alien's underlying labor certification prior to April 30, 2001.

21. A lawful permanent resident may work and live in the United States indefinitely and, should he or she so choose, apply for United States citizenship.

22. A form ETA 750, a form I-140, and a form I-485 are applications required by the immigration laws of the United States and the regulations prescribed thereunder.

23. The General Allegations in paragraphs 1 through 22 of this Superseding Indictment are specifically re-alleged and incorporated in Counts 1 through 70 below as if they were fully set forth in each count.

COUNT 1

Conspiracy to Commit Immigration Fraud and False Statements

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia and elsewhere, the defendants, NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, BEMBA BALSIROV, ROBERT J. MAHOOD, and ALICE JIA knowingly and unlawfully conspired with persons known and unknown to the Grand Jury to commit the following offenses against the United States:

(a) to knowingly subscribe as true under penalty of perjury (as permitted under Title 28, United States Code, Section 1746) a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder and to knowingly present such application, affidavit, and other document which contained such false statement and which failed to contain any reasonable basis in law or fact, in violation of Title 18, United States Code, Section 1546(a);

(b) to knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the government of the United States, in violation of Title 18, United States Code, Section 1001(a)(2); and

(c) to knowingly and willfully make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a

matter within the jurisdiction of the executive branch of the government of the United States, in violation of Title 18, United States Code, Section 1001(a)(3).

2. Specifically, from in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia and elsewhere, the defendants knowingly conspired with each other and with others to prepare fraudulent Applications for Alien Employment Certification, officially known as forms ETA 750, and fraudulent Immigrant Petitions for Alien Worker, officially known as forms I-140, and to present these applications and petitions, together with supporting documentation, to the Virginia Employment Commission, the Maryland Department of Labor Licensing and Regulation, the New Jersey Alien Labor Certification Unit, the United States Department of Labor, the Immigration and Naturalization Service, the United States Department of Homeland Security, and the United States Department of State.

Purpose, Manner, and Means of the Conspiracy

3. The purpose of the conspiracy was to enrich the defendants and their co-conspirators by charging aliens, who were seeking to enter or remain in the United States, large sums of money to obtain “green cards” for the aliens, by preparing fraudulent ETA 750 applications and I-140 petitions and by presenting those same applications and petitions to the Virginia Employment Commission, the Maryland Department of Labor Licensing and Regulation, the New Jersey Alien Labor Certification Unit, the United States Department of Labor, the Immigration and Naturalization Service, the United States Department of Homeland Security, and the United States Department of State.

The manner and means by which the conspirators conducted the conspiracy included the following:

East Coast Fabricators, Inc.

4. It was part of the conspiracy that the defendants and their co-conspirators would and did prepare and submit to the Department of Labor, through the Virginia Employment Commission, approximately 250 fraudulent ETA 750 applications naming East Coast Fabricators, Inc., (“ECF”) as the employer. These applications were fraudulent in that, among other things, they falsely stated that ECF was in the residential construction business, that ECF intended to hire hundreds of aliens in various residential construction trades, that ECF had tried and failed to find U.S. workers to fill these positions, and that defendant BALSIROV was employed by ECF as its construction manager. In fact, ECF was laying off U.S. workers during the same time that the defendants and their co-conspirators were claiming in many ETA 750 applications and I-140 petitions that the aliens would work at ECF.

5. It was further part of the conspiracy that the defendants and their co-conspirators would and did cause advertisements to be placed in newspapers in the Northern Virginia area for various positions in the residential construction trades. Many of these advertisements told applicants to contact defendant BALSIROV at a telephone number in New Jersey, although the job was supposedly at ECF in Winchester, Virginia.

6. It was further part of the conspiracy that the defendants and their co-conspirators would and did submit copies of the advertisements to the VEC and DOL to falsely show that the jobs were available to U.S. workers and that no U.S. workers had applied for the positions.

When the VEC questioned the New Jersey telephone number given in the advertisements, the defendants and their co-conspirators falsely stated that ECF's headquarters was in New Jersey.

7. It was further part of the conspiracy that the defendants and their co-conspirators would and did create fraudulent notices of job opportunities for positions in the residential construction trades.

8. It was further part of the conspiracy that the defendants and their co-conspirators would and did provide copies of these fraudulent notices to the VEC and DOL to falsely show that the jobs were available to U.S. workers and that no U.S. workers had applied for the positions. The notices had not been posted at ECF, however.

9. It was further part of the conspiracy that the defendants and their co-conspirators would and did create fraudulent employment letters and fraudulent employment contracts between the aliens and ECF, and that the defendants and their co-conspirators would and did submit these documents to the U.S. Department of State in support of the aliens' visa applications.

Two Brothers Unlimited

10. It was further part of the conspiracy that the defendants and their co-conspirators would and did prepare and submit approximately 80 fraudulent ETA 750 applications naming as the employer Two Brothers Unlimited, a New Jersey company that provided commercial and residential framing and other rough carpentry services. The applications were filed on behalf of many of the same aliens who were named in the ECF applications described above. These applications were fraudulent in that, among other things, they falsely stated that Two Brothers intended to hire the aliens in various residential construction trades, that Two Brothers had tried

and failed to find U.S. workers to fill these positions, and that Two Brothers' owner had signed the applications. In fact, Two Brothers had approximately three employees at the time that the defendants and their co-conspirators were filing these ETA 750 applications claiming that the aliens would work there, it had no need for the painters, electricians, cement masons, and other construction positions claimed in the applications, and its owner's signature had been forged by the defendants and their co-conspirators without her knowledge.

D.R. Horton, Inc.

11. It was further part of the conspiracy that the defendants and their co-conspirators would and did prepare and submit approximately 80 fraudulent ETA 750 applications naming as the employer D.R. Horton, Inc., a residential construction company. The applications were filed on behalf of many of the same aliens who were named in the ECF applications described above. These applications were fraudulent in that, among other things, they falsely stated that D.R. Horton intended to hire the aliens in various residential construction trades, that D.R. Horton had tried and failed to find U.S. workers to fill these positions, and that a D.R. Horton representative had signed the applications. In fact, the applications were filed without D.R. Horton's knowledge, the person whose name appeared as the supposed D.R. Horton representative had never worked for D.R. Horton, and his signature had been forged by the defendants and their co-conspirators without his knowledge.

Cleaners of America

12. It was further part of the conspiracy that the defendants and their co-conspirators would and did prepare and submit approximately 390 fraudulent ETA 750 applications naming as the employer Cleaners of America (COA), a company that provided janitorial services. These

applications were fraudulent in that, among other things, they falsely stated that COA intended to hire hundred of aliens as cleaning supervisors, that COA planned to employ them in full-time positions, and that COA had tried and failed to find U.S. workers to fill these positions.

13. It was further part of the conspiracy that the defendants and their co-conspirators would and did cause advertisements to be placed in newspapers in the Northern Virginia area for positions as cleaning supervisors, which were later submitted to the VEC in support of aliens' applications for labor certification. Defendant IVANCHUKOV instructed co-conspirator Paul V. Mederos to disqualify any U.S. worker who applied for the advertised positions. IVANCHUKOV also added unnecessarily restrictive requirements to the advertisements, to limit the number of applicants and to make it easier to disqualify any U.S. workers who applied.

14. It was further part of the conspiracy that IVANCHUKOV instructed Mederos to post the notices of job opportunity for the cleaning supervisor positions, which were later submitted to the VEC in support of aliens' applications for labor certification, in a location at COA that was inaccessible, in a further effort to limit the number of U.S. workers who applied for the positions.

15. It was further part of the conspiracy that the defendants and their co-conspirators would and did file fraudulent I-140 petitions for many of these same aliens falsely claiming that the aliens would be employed full-time by COA.

Other Employers/Sponsors

16. It was further part of the conspiracy that the defendants and their co-conspirators would and did make similar false and fraudulent statements in ETA 750 applications, I-140 petitions, and supporting documentation Global filed on behalf of other employers, including

Superior Building Services, Professional Environmental Management Enterprises (PEME), National Facilities Services, and Falls Church Amoco, as sponsors of alien workers.

Fraudulent Verifications of Employment

17. It was further part of the conspiracy that defendants TSUI and JIA and their co-conspirators at U.S. Eagle and elsewhere would and did create and obtain fraudulent verifications of employment (VOEs) from the People's Republic of China and elsewhere falsely to show that the aliens had certain job experience that was required to obtain approval of their ETA 750 applications and I-140 petitions. These fraudulent VOEs were then provided to defendants IVANCHUKOV and PAPPADAKIS and their co-conspirators at Global to be submitted in support of ETA 750 applications and I-140 petitions.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the defendants and their co-conspirators knowingly performed overt acts in the Eastern District of Virginia and elsewhere. These acts included the following:

18. On or about the dates below, having previously submitted to the Virginia Employment Commission, for the aliens listed below, fraudulent applications for labor certification for nonexistent jobs at ECF, the defendants and their co-conspirators prepared and submitted to the Maryland DLLR, for these same aliens, fraudulent applications for labor certification for nonexistent jobs at D.R. Horton, Inc.

Overt Act	Alien	Position	East Coast ETA 750	D.R. Horton ETA 750
1	Jose A. Sierra	Residential Painter	8/17/00	4/5/04
2	Luis E. Cordova	Residential Painter	11/20/00	4/5/04
3	Daniel E. Castillo	Residential Painter	3/26/01	4/5/04

4	Jose A. Cordova	Residential Painter	3/26/01	4/5/04
5	Juan G. Gumucio	Residential Painter	3/26/01	4/5/04
6	Jose Luna	Residential Painter	3/26/01	4/5/04
7	Jose Luis Astorga	Residential Painter	4/30/01	4/5/04
8	Carlos Omar Centellas	Residential Painter	4/30/01	4/5/04
9	Roberto A. Claire Illanes	Residential Painter	4/30/01	4/5/04
10	Ronald Meneses	Residential Painter	4/30/01	4/5/04
11	Julio C. Moran	Residential Painter	4/30/01	4/5/04
12	Rene Munoz	Residential Painter	4/30/01	4/5/04
13	Manuel Villanueva	Residential Painter	4/30/01	4/5/04
14	Fidel A. Fuentes	Residential Painter	4/30/01	4/5/04
15	Mario G. Ferrari	Carpenter	10/20/00	4/6/04
16	German Antezana	Carpenter	3/26/01	4/6/04
17	Alfonso P. Mendes	Carpenter	3/26/01	4/6/04
18	Rene Salomon Melgarejo	Carpenter	4/30/01	4/6/04
19	Miguel A. Trigo	Carpenter	4/30/01	4/6/04
20	Oscar F. Silva	Cement Mason	3/28/01	5/10/04
21	Carlos J. Ustariz	Cement Mason	4/30/01	5/10/04
22	Jose L. Galindo	Cement Mason	4/30/01	5/10/04
23	Juan C. Blanco	Cement Mason	4/30/01	5/10/04
24	Rene D. Foronda	Cement Mason	4/30/01	5/10/04
25	Shakeel Imran	Cement Mason	4/30/01	5/10/04
26	Alberto Luis La Rosa	Cement Mason	4/30/01	5/10/04
27	Elbert Quiroga	Cement Mason	4/30/01	5/10/04
28	Sabino Terrazas	Cement Mason	4/30/01	5/10/04
29	Aleksandr A. Mehh	Electrician	11/17/00	5/26/04
30	Leonardo Guerrero	Electrician	4/30/01	5/26/04
31	Mikhail V. Archaev	Electrician	4/30/01	5/26/04

32	Alain M. Moscoso	Electrician	4/30/01	5/26/04
33	Juan C. Moscoso	Electrician	4/30/01	5/26/04
34	Cesar D. Ugarte	Electrician	4/30/01	5/26/04
35	Ivan A. Kharaev	Electrician	7/19/01	5/26/04
36	Baatr V. Onkorov	Electrician	7/19/01	5/26/04
37	Nikolai A. Savtchenko	Electrician	9/20/01	5/26/04
38	Jian Wang Li	Electrician	10/22/01	5/26/04
39	Chun Yi Huo	Electrician	11/16/01	5/26/04
40	Chun Guan Liu	Electrician	11/16/01	5/26/04
41	Guo Dong Liu	Electrician	11/16/01	5/26/04
42	Bin Shi	Electrician	11/16/01	5/26/04
43	Quan Yi Su	Electrician	11/16/01	5/26/04
44	Jin Hai Wang	Electrician	11/16/01	5/26/04
45	Yun Tang Zhou	Electrician	11/16/01	5/26/04
46	Guido Andia	Residential Painter	4/30/01	6/8/04
47	Shou Hua Lin	Residential Painter	11/20/00	6/8/04
48	Jose C. Aguila	Residential Painter	3/26/01	6/8/04
49	Irineo Villarroel	Residential Painter	3/26/01	6/8/04
50	Neng Rong Yang	Residential Painter	3/26/01	6/8/04
51	Felix A. Luengas	Residential Painter	4/30/01	6/8/04
52	Sergio P. Martinez	Residential Painter	4/30/01	6/8/04
53	Luis A. Mego	Residential Painter	4/30/01	6/8/04
54	Jorge L. Paredes	Residential Painter	4/30/01	6/8/04
55	Xue Run Zheng	Residential Painter	12/26/01	6/8/04
56	Hua Xiong Zhou	Residential Painter	12/26/01	6/8/04
57	Li Qiang Zhou	Residential Painter	12/26/01	6/8/04
58	Sheng Jian Xie	Residential Painter	12/26/01	6/8/04
59	Long Zhou	Residential Painter	12/26/01	6/8/04

60	Dian Fa Li	Residential Painter	12/26/01	6/8/04
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1. On or about the dates below, having previously submitted to the Virginia Employment Commission, for the aliens listed below, fraudulent applications for labor certification for nonexistent jobs at ECF, the defendants and their co-conspirators prepared and submitted to the Alien Labor Certification Unit of the New Jersey Department of Labor, for these same aliens, fraudulent applications for labor certification for nonexistent jobs at Two Brothers Unlimited.

Overt Act	Alien	Position	East Coast ETA 750	Two Brothers ETA 750
61	Jianxing Li	Residential Painter	8/17/00	10/29/03
62	Natalja Erdneeva	Residential Painter	11/20/00	10/29/03
63	Timur A. Kharayev	Residential Painter	11/20/00	10/29/03
64	Olga Piourbeeva	Residential Painter	11/20/00	10/29/03
65	Xin Yi Wang	Residential Painter	3/26/01	10/29/03
66	Xue Shen Li	Residential Painter	3/26/00	10/29/03
67	Wei Liang	Residential Painter	4/30/01	10/29/03
68	Wan Zhi Lin	Residential Painter	4/30/01	10/29/03
69	Jian Ren Lin	Residential Painter	4/30/01	10/29/03
70	Yi Wen Lin	Residential Painter	4/30/01	10/29/03
71	Zhi Ye Lu	Residential Painter	5/15/01	10/29/03
72	Huo Song Wang	Residential Painter	8/22/01	10/29/03
73	Jia Le Wang	Residential Painter	8/22/01	10/29/03
74	Xiu Lin Chen	Residential Painter	8/22/01	10/29/03
75	Li Rong Dong	Residential Painter	12/12/01	10/29/03
76	Chun Yong Li	Residential Painter	12/12/01	10/29/03
77	Jun Bin Chen	Residential Painter	12/12/01	10/29/03

78	Guo Shu Li	Residential Painter	12/12/01	10/29/03
79	Shan Guang Li	Residential Painter	12/12/01	10/29/03
80	Xiao Min Li	Residential Painter	12/12/01	10/29/03
81	Cheng Lin Lin	Residential Painter	12/12/01	10/29/03
82	Pin Zun Yang	Residential Painter	12/12/01	10/29/03
83	Yi Yun Zheng	Residential Painter	12/12/01	10/29/03
84	Ming Feng Chen	Residential Painter	12/26/01	10/29/03
85	Yong Long Chen	Residential Painter	12/26/01	10/29/03
86	Chuan Qing Fang	Residential Painter	12/26/01	10/29/03
87	Jing Ming Fang	Residential Painter	12/26/01	10/29/03
88	Zeng Liu Huang	Residential Painter	12/26/01	10/29/03
89	Wen Feng Li	Residential Painter	12/26/01	10/29/03
90	Yi En Wang	Residential Painter	12/26/01	10/29/03
91	Qing Rong Zhao	Residential Painter	12/26/01	10/29/03
92	Wei Shao Zhen	Residential Painter	12/26/01	10/29/03
93	Wei Zheng	Residential Painter	12/2/6/01	10/29/03

1. On or about the dates below, having previously submitted to the Virginia Employment Commission, for the aliens listed below, fraudulent applications for labor certification for nonexistent jobs at ECF, the defendants and their co-conspirators prepared and submitted to the Virginia Employment Commission, for these aliens' wives, fraudulent applications for labor certification for nonexistent jobs at Cleaners of America.

Overt Act	Alien	Position	East Coast ETA 750	Cleaners ETA 750
94	Songsheng Dong	Residential Painter	8/17/00	
	Xue Ying Chen (wife)	Cleaning Supervisor		9/21/02
95	Qiming Chen	Residential Painter	8/17/00	

	Hua Mei Dong (wife)	Cleaning Supervisor		9/24/02
96	Li Jun Lin	Residential Painter	12/12/01	
	Jian Lan Li (wife)	Cleaning Supervisor		1/2/03
97	Dian Biao Jiang	Residential Painter	4/30/01	
	Yu Chai Chen (wife)	Cleaning Supervisor		7/3/03
98	Xue Jing Lan	Residential Painter	4/30/01	
	Ming Qing Zheng (wife)	Cleaning Supervisor		7/7/03
99	Jian Hua Lin	Residential Painter	8/22/01	
	Yan Fei Lin (wife)	Cleaning Supervisor		2/10/03
100	Ren Ri Liu	Residential Painter	12/12/01	
	Jing Zhang (wife)	Cleaning Supervisor		2/14/03
101	Gui Sheng Bao	Cement Mason	3/28/01	
	Yan Ping Chen (wife)	Cleaning Supervisor		7/7/03
102	Dong Mi Yang	Cement Mason	3/28/01	
	Xiu Ping Weng (wife)	Cleaning Supervisor		7/7/03
103	Jianxing Li	Residential Painter	8/17/01	
	Xiu Fang Lin (wife)	Cleaning Supervisor		9/21/02
104	Rong Huang Chen	Glacier	12/19/01	
	Xiu Zhen Que (wife)	Cleaning Supervisor		6/30/03

(In violation of Title 18, United States Code, Section 371.)

COUNT 2

Conspiracy to Encourage an Alien to Unlawfully Enter the United States

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia and elsewhere, the defendants, NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, BEMBA BALSIROV, ROBERT J. MAHOOD, and ALICE JIA, for the purpose of commercial advantage and private financial gain, knowingly and unlawfully conspired with persons known and unknown to the Grand Jury to encourage and induce an alien to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of law.

2. Specifically, from in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia and elsewhere, the defendants knowingly conspired with each other and with others to encourage and induce aliens to come to, enter, and reside in the United States by obtaining “green cards” for these aliens through the preparation and submission of Applications for Alien Employment Certification, officially known as forms ETA 750, Immigrant Petitions for Alien Worker, officially known as forms I-140, and supporting documentation, knowing and in reckless disregard of the fact that material information contained in such applications, petitions, and documentation was false, fraudulent, and fictitious.

3. In furtherance of the conspiracy and to effect the objects thereof, the defendants and their co-conspirators submitted ETA 750s on behalf of the following aliens, listing the following employers as sponsors, on or about the dates below:

Alien	Position	Employer	ETA 750 Received
David A. Menkenasunov	Carpenter	ECF	7/5/00
Boris P. Beltinov	Carpenter	ECF	7/5/00
Ke Han Jin	Cleaning Supervisor	COA	6/15/01
Yi Qing Dong	Cleaning Supervisor	COA	7/9/01
Qi Ping Chen	Cleaning Supervisor	COA	7/9/01
Ji Min Guan	Cleaning Supervisor	COA	7/9/01
Zheng Hua He	Cleaning Supervisor	COA	7/9/01
Chuan Jian Yang	Cleaning Supervisor	COA	9/4/01
Meng Tao Zhang	Cleaning Supervisor	COA	11/22/02
Yue Xia Pu	Cleaning Supervisor	COA	11/29/02
Xin De Wu	Cleaning Supervisor	COA	1/2/03
Xin Ying Yang	Cleaning Supervisor	COA	3/17/03
Bi Fang Pan	Cleaning Supervisor	COA	4/28/03
Xing Feng Yang	Cleaning Supervisor	COA	6/24/03
Jia Lin Liu	Cleaning Supervisor	COA	7/7/03

Chang Shan Nai	Cleaning Supervisor	COA	7/9/01
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(In violation of Title 8, United States Code, § 1324(a)(1)(A)(v)(I) & (B)(1).)

COUNTS 3 THROUGH 12

Immigration Fraud

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates below, in the Eastern District of Virginia, the defendants, NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, BEMBA BALSIROV, ROBERT J. MAHOOD, and ALICE JIA, knowingly subscribed as true, under penalty of perjury (as permitted under Title 28, United States Code, Section 1746), a false statement with respect to a material fact in the applications listed below (including the documents attached to and supporting the same), which applications were required by the immigration laws and the regulations prescribed thereunder, and knowingly presented such applications which contained such false statements and which failed to contain any reasonable basis in law and fact, and knowingly aided and abetted the same.

2. Specifically, on or about the dates below, in the Eastern District of Virginia, the defendants, NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, BEMBA BALSIROV, ROBERT J. MAHOOD, and ALICE JIA, knowingly prepared fraudulent Applications for Alien Employment Certification, officially known as forms ETA 750, and then submitted the same applications to the United States Department of Labor through the Virginia Employment Commission. The defendants falsely claimed in each application and its supporting documentation that the alien was to work at East Coast Fabricators, Inc.; that the job opportunity to be filled by the alien had been clearly open to any qualified U.S. worker; that defendant BEMBA

BALSIROV was a construction manager of ECF; and that ECF was engaged in the residential construction business.

Count	Alien	Position	ETA 750 Received
3	Alexey S. Djekiyev	Carpenter	July 5, 2000
4	Guillermo Aguilar	Plasterer	August 7, 2000
5	Aleksandras Sasnauskas	Heating & AC Installer	August 22, 2000
6	Xian Gui Zhou	Residential Plumber	October 31, 2000
7	Xue Kai Chen	Residential Painter	November 20, 2000
8	He Quan Dong	Residential Painter	November 20, 2000
9	Xiang Dong Jiang	Residential Painter	November 20, 2000
10	Li Dong Ou	Residential Painter	November 20, 2000
11	German Antezana	Carpenter	March 26, 2001
12	Wen Ze Zhang	Carpenter	March 26, 2001

(In violation of Title 18, United States Code, Sections 2 and 1546(a).)

COUNTS 13 THROUGH 27

Immigration Fraud

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates below, in the Eastern District of Virginia, the defendants, NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, BEMBA BALSIROV, ROBERT J. MAHOOD, and ALICE JIA, knowingly subscribed as true, under penalty of perjury (as permitted under Title 28, United States Code, Section 1746), a false statement with respect to a material fact in the applications listed below (including the documents attached to and supporting the same), which applications were required by the immigration laws and the regulations prescribed thereunder, and knowingly presented such applications which contained such false statements and which failed to contain any reasonable basis in law and fact, and knowingly aided and abetted the same.

2. Specifically, on or about the dates below, in the Eastern District of Virginia, the defendants, NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, BEMBA BALSIROV, ROBERT J. MAHOOD, and ALICE JIA, knowingly prepared fraudulent Immigrant Petitions for Alien Worker, officially known as forms I-140, together with supporting documentation, and then submitted the same to the Immigration and Naturalization Service. The defendants falsely claimed in each petition and its supporting documentation that the alien was to work at East Coast Fabricators, Inc.; that the job opportunity to be filled by the alien had been clearly open

to any qualified U.S. worker; that defendant BEMBA BALSIROV was a construction manager of ECF; and that ECF was engaged in the residential construction business.

Count	Alien	Position	I-140 Received
13	Avilio Raul Jimenez	Residential Painter	November 7, 2000
14	Boris P. Beltinov	Carpenter	March 26, 2001
15	Mikhail Badmayev	Carpenter	March 26, 2001
16	David A. Menkenasunov	Carpenter	March 26, 2001
17	Rimantas Galeckas	Carpenter	March 26, 2001
18	Igor Y. Rudenko	Carpenter	March 26, 2001
19	Long Xiang Chen	Electrician	April 4, 2001
20	Shou Hua Lin	Residential Painter	May 8, 2001
21	Yongtang Leng	Carpenter	May 8, 2001
22	Rolando F. Orbezo	Heating & AC Installer	May 21, 2001
23	Savr A. Samtonov	Carpenter	May 24, 2001
24	Santos Choque Martinez	Residential Painter	June 12, 2001
25	Felix Choque Martinez	Residential Painter	June 12, 2001

26	Chunyong Yu	Cement Mason	August 6, 2002
27	Neng Rong Yang	Residential Painter	August 6, 2002

(In violation of Title 18, United States Code, Sections 2 and 1546(a).)

COUNTS 28 THROUGH 37

Immigration Fraud

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates below, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, and MICHELLE I. PAPPADAKIS knowingly subscribed as true, under penalty of perjury (as permitted under Title 28, United States Code, Section 1746), a false statement with respect to a material fact in the applications listed below (including the documents attached to and supporting the same), which applications were required by the immigration laws and the regulations prescribed thereunder, and knowingly presented such applications which contained such false statements and which failed to contain any reasonable basis in law and fact, and knowingly aided and abetted the same.

2. Specifically, on or about the dates below, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, and MICHELLE I. PAPPADAKIS knowingly prepared fraudulent Applications for Alien Employment Certification, officially known as forms ETA 750, and then submitted the same applications to the United States Department of Labor through the Maryland Department of Labor Licensing and Regulation. The defendants falsely claimed in each application and its supporting documentation that the alien listed below was to work at D.R. Horton, Inc.; that the job opportunity to be filled by the alien had been clearly open to any qualified U.S. worker; and that the individual supposedly signing on behalf of D.R. Horton, Inc., was employed by D.R. Horton, Inc., when in fact he was not and his signature had been forged.

Count	Alien	Position	ETA 750 Received
28	Chun Yi Huo	Electrician	May 26, 2004

29	Jian Wang Li	Electrician	May 26, 2004
30	Chun Guan Liu	Electrician	May 26, 2004
31	Guo Dong Liu	Electrician	May 26, 2004
32	Bin Shi	Electrician	May 26, 2004
33	Dian Fa Li	Residential Painter	June 8, 2004
34	Shou Hua Lin	Residential Painter	June 8, 2004
35	Neng Rong Yang	Residential Painter	June 8, 2004
36	Xue Run Zheng	Residential Painter	June 8, 2004
37	Long Zhou	Residential Painter	June 8, 2004

(In violation of Title 18, United States Code, Sections 2 and 1546(a).)

COUNTS 38 THROUGH 47

Immigration Fraud

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates below, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, and MICHELLE I. PAPPADAKIS knowingly subscribed as true, under penalty of perjury (as permitted under Title 28, United States Code, Section 1746), a false statement with respect to a material fact in the applications listed below (including the documents attached to and supporting the same), which applications were required by the immigration laws and the regulations prescribed thereunder, and knowingly presented such applications which contained such false statements and which failed to contain any reasonable basis in law and fact, and knowingly aided and abetted the same.

2. Specifically, on or about the dates below, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, and MICHELLE I. PAPPADAKIS knowingly prepared fraudulent Applications for Alien Employment Certification, officially known as forms ETA 750, and then submitted the same applications to the United States Department of Labor through the Alien Labor Certification Unit of the New Jersey Department of Labor. The defendants falsely claimed in each application and its supporting documentation that the alien listed below was to work at Two Brothers Unlimited; that the job opportunity to be filled by the alien had been clearly open to any qualified U.S. worker; and that an individual had declared under penalty of perjury that the information in the application was true and correct, when in fact it was not and the individual's signature had been forged.

Count	Alien	Position	ETA 750 Received
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38	Xiu Lin Chen	Residential Painter	October 29, 2003
39	Li Rong Dong	Residential Painter	October 29, 2003
40	Chun Yong Li	Residential Painter	October 29, 2003
41	Jianxing Li	Residential Painter	October 29, 2003
42	Xue Shen Li	Residential Painter	October 29, 2003
43	Wei Liang	Residential Painter	October 29, 2003
44	Jian Ren Lin	Residential Painter	October 29, 2003
45	Wan Zhi Lin	Residential Painter	October 29, 2003
46	Jia Le Wang	Residential Painter	October 29, 2003
47	Xin Yi Wang	Residential Painter	October 29, 2003

(In violation of Title 18, United States Code, Sections 2 and 1546(a).)

COUNT 48

Immigration Fraud

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 21, 2000, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, and ALICE JIA knowingly subscribed as true, under penalty of perjury (as permitted under Title 28, United States Code, Section 1746), a false statement with respect to a material fact in an application and document required by the immigration laws and the regulations prescribed thereunder, and knowingly presented such application and document which contained such a false statement and which failed to contain any reasonable basis in law and fact, and knowingly aided and abetted the same. Specifically, on or about July 21, 2000, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV, GEORGE TSUI, REX B. WINGERTER, MICHELLE I. PAPPADAKIS, and ALICE JIA knowingly prepared a fraudulent Application for Alien Employment Certification, officially known as forms ETA 750, and then submitted the same application to the United States Department of Labor through the Virginia Employment Commission. The defendants falsely claimed in the application and its supporting documentation that an alien, Wu Lian, was to work at Falls Church Amoco; that the job opportunity to be filled by the alien had been clearly open to any qualified U.S. worker; and that Falls Church Amoco had attempted without success to recruit U.S. workers for the job opportunity, when in fact the job opportunity did not exist and Falls Church Amoco had no intention to hire the alien.

(In violation of Title 18, United States Code, Sections 2 and 1546(a).)

Conspiracy to Commit Money Laundering

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia and elsewhere, defendants NARAN S. IVANCHUKOV and MICHELLE I. PAPPADAKIS unlawfully and knowingly conspired to conduct a financial transaction affecting interstate commerce, which transaction would involve the proceeds of a specified unlawful activity, with the intent to promote the carrying on of said specified unlawful activity, when the defendants knew that the property involved in the financial transaction would represent the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

2. Specifically, from on or about April 2000 through at least August 2004, in the Eastern District of Virginia and elsewhere, the defendants conspired to deposit into bank accounts the defendants controlled the illegal proceeds of their activities to commit immigration fraud, in violation of Title 18, United States Code, Sections 1546(a), and their activities to encourage an alien to unlawfully enter the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A), and to use the proceeds in these same accounts to make payments to defendant BALSIROV, to Paul V. Mederos, and to other employers/sponsors, and to pay the salaries of Global employees and other Global expenses, which payments were designed to promote the carrying on of the defendants' illegal activities.

3. Title 18, United States Code, Section 1546(a), and Title 8, United States Code, Section 1324(a)(1)(A), are specified unlawful activities as that term is defined in Title 18, United States Code, Section 1956(c)(7)(A).

(In violation of Title 18, United States Code, Section 1956(h).)

COUNTS 50 THROUGH 68

Money Laundering

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates below, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV and MICHELLE I. PAPPADAKIS unlawfully and knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of said specified unlawful activity, and while conducting and attempting to conduct this financial transaction, the defendants knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

2. Specifically, on or about the dates below, in the Eastern District of Virginia, the defendants caused checks drawn on Global's account at the Bank of America, account number 004119025325, to be written in the following amounts to the following individual as payment for the individual's efforts in the preparation and submission of fraudulent ETA 750 applications, I-140 petitions, and supporting documentation. At the time of these transfers, the defendants knew that the funds transferred involved the proceeds of the defendants' illegal activities to commit immigration fraud, in violation of Title 18, United States Code, Section 1546(a), and their activities to encourage an alien to unlawfully enter the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A), and intended the payments to the individual to promote these same illegal activities.

3. Title 18, United States Code, Section 1546(a), and Title 8, United States Code, Section 1324(a)(1)(A), are specified unlawful activities as that term is defined in Title 18, United States Code, Section 1956(c)(7)(A).

Count	Payee	Amount	Check No.	Date of Check
50	Bemba Balsirov	\$9,000	1259	February 9, 2001
51	Paul V. Mederos	\$25,000	1292	March 20, 2001
52	Paul V. Mederos	\$10,000	1305	April 3, 2001
53	Paul V. Mederos	\$25,000	1333	April 17, 2001
54	Paul V. Mederos	\$50,000	1355	May 7, 2001
55	Paul V. Mederos	\$20,000	1434	June 25, 2001
56	Bemba Balsirov	\$9,500	1454	July 6, 2001
57	Paul V. Mederos	\$20,000	1484	July 24, 2001
58	Paul V. Mederos	\$15,000	1519	August 16, 2001
59	Paul V. Mederos	\$10,000	1585	September 18, 2001
60	Paul V. Mederos	\$10,000	1601	October 16, 2001
61	Bemba Balsirov	\$7,000	1634	November 6, 2001
62	Bemba Balsirov	\$5,000	1635	November 6, 2001
63	Paul V. Mederos	\$11,000	1644	November 14, 2001
64	Bemba Balsirov	\$5,000	1791	February 28, 2002
65	Bemba Balsirov	\$5,000	1792	March 20, 2002
66	Bemba Balsirov	\$5,000	1843	April 16, 2002
67	Paul V. Mederos	\$5,000	1847	April 19, 2002
68	Paul V. Mederos	\$10,000	2102	November 19, 2002

(In violation of Title 18, United States Code, Sections 2 and 1956(a)(1)(A)(i).)

COUNT 69

Misprision of Felony

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia, defendant REX B. WINGERTER, having knowledge of the actual commission of a felony cognizable by a court of the United States, concealed and did not as soon as possible make known the same to some judge or other persons in civil or military authority under the United States.

2. Specifically, from in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia, the defendant had knowledge of the commission of the crime of conspiracy to commit immigration fraud and false statements, the crime of conspiracy to encourage an alien to unlawfully enter the United States, and the crimes of immigration fraud, as alleged in this Superseding Indictment, and by his actions as general counsel for Global concealed and did not make known these crimes to any judge or other person in authority.

(In violation of Title 18, United States Code, Section 4.)

Conspiracy to Defraud the United States

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about April 2000 through at least in or about August 2004, in the Eastern District of Virginia, defendants NARAN S. IVANCHUKOV and MICHELLE I. PAPPADAKIS knowingly and unlawfully conspired with persons known and unknown to the Grand Jury to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the Internal Revenue Service of the Treasury Department in the ascertainment, computation, assessment, and collection of the revenue, that is, income taxes.

Manner and Means of the Conspiracy

2. It was part of the conspiracy that Global, under the control of defendants IVANCHUKOV and PAPPADAKIS, would and did conduct much of its business in cash and that it would and did regularly keep cash for the payment of the defendants' personal and business expenses in a safe at Global, rather than depositing the cash in Global's bank accounts.

3. It was further part of the conspiracy that Global, under the control of defendants IVANCHUKOV and PAPPADAKIS, would and did structure the cash deposits that it did make in such a way as to attempt to avoid triggering a currency transaction report, or CTR, by the bank.

4. It was further part of the conspiracy that Global, under the control of defendants IVANCHUKOV and PAPPADAKIS, would and did fail to file a federal income tax return and that it would and did fail to report any income earned during the course of the conspiracy.

5. It was further part of the conspiracy that defendant IVANCHUKOV would and did fail to file a federal income tax return and that he would and did fail to report any income earned during the course of the conspiracy.

6. It was further part of the conspiracy that defendant PAPPADAKIS would and did fail to file a federal income tax return and that she would and did fail to report any income earned during the course of the conspiracy.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the defendants and their co-conspirators knowingly performed overt acts in the Eastern District of Virginia and elsewhere. These acts included the following:

7. In or about 2001, defendants IVANCHUKOV and PAPPADAKIS caused Global to pay to defendant PAPPADAKIS, or on her behalf, approximately \$136,000 in cash and personal expenses.

8. In or about 2002, defendants IVANCHUKOV and PAPPADAKIS caused Global to pay to defendant PAPPADAKIS, or on her behalf, approximately \$98,000 in cash and personal expenses.

9. On or about February 19, 2003, defendant PAPPADAKIS instructed an underling at Global to deposit \$15,000 in cash into a Global bank account, but to

structure the transaction in two \$7,500 deposits on different days, in order to avoid “IRS flags.”

10. On or about February 20, 2003, and pursuant to defendant PAPPADAKIS instructions, an underling at Global did in fact deposit \$7,500 in cash into a Global bank account.

1. On or about February 21, 2003, and pursuant to defendant PAPPADAKIS instructions, an underling at Global did in fact deposit \$7,500 in cash into a Global bank account. (In violation of Title 18, United States Code, Section 371.)

Criminal Forfeiture

THE GRAND JURY FURTHER CHARGES THAT:

Upon conviction of any of the offenses charged in Counts 1 through 48 of this Superseding Indictment, the defendants shall forfeit to the United States any property, real or personal, (1) that constitutes, or is derived from, or is traceable to, the proceeds obtained directly or indirectly from the commission of the offense; or (2) that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

Upon conviction of any of the offenses charged in Counts 49 through 68 of this Superseding Indictment, the defendants shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This property includes, but is not limited to, the following:

1. All assets of Global Recruitment and Immigration Services, Inc., including all funds in account number 004119025325 at Bank of America;
2. All assets of International Solutions Group, Inc., including all funds in account number 1031236 at The Business Bank;
3. All assets of U.S. Eagle, Inc., including all funds in account number 2000014731279 at Wachovia Bank; all funds in account number 139-430471-4 at Chevy Chase Bank; and all funds in account no. 220029849 at SunTrust Bank;
4. All of defendant TSUI's right, title, and interest in Peking Gourmet Inn, Inc.;
5. All funds in account numbers 7923381036 and 1010061788871 at Wachovia Bank;
6. All funds in account number 96256525 at Bank of America;
7. All funds in account numbers 94926873, 4124398966, and L60-108642 at Bank of America;

8. All funds in account numbers 09L014520 and 09L014538 at Bowman Gaskins Financial Group (also known as Walnut Street Securities, Inc.);
9. All jewelry and other valuables contained in a small gray safe seized from the home of defendant Naran S. Ivanchukov;
10. 47362 Darkhollow Falls Terrace, Sterling Virginia;
11. 8370 Greensboro Drive, #911, McLean, Virginia;
12. 4 Michael Court, N.W., Ft. Walton Beach, Florida;
13. 6143 Mountain Springs Lane, Clifton, Virginia;
14. 205 Yoakum Parkway, Unit 1826, Alexandria, Virginia
15. 851 North Glebe Road, Unit 1905, Arlington, Virginia
16. All funds in account numbers 1010035171223 and 3000025616735 at Wachovia Bank;
17. All funds in account numbers 800023 and 811122 at FNB of Palmerton;
18. All funds in account number 0002872781 at Bank of Hawaii;
19. 2003 Jeep, Pennsylvania Tag No. FCD 8448, VIN # 1J4GW48S43C513520
20. 2000 Mercedes Benz, Pennsylvania Tag No. EZT 9195, VIN # WDBNG75J7YA095740
21. 2003 Honda Pilot, Maryland Tag No. AEM 90P, VIN # 2HKYF18593H611692
22. 2004 Dodge Ram, New Jersey Tag No. RCE 68R, VIN # 1D7HA18N94S605110
23. 2003 Lincoln, Virginia Tag No. JCM 8368, VIN # 1LNHM82W73Y678351
24. 2002 Mercedes Benz, Virginia Tag No. GT168, VIN # WDBNG75J12A255408

25. A sum of money equal to at least \$4,500,000 in United States currency, representing the amount of proceeds obtained as a result of the violations alleged in Counts 1 through 46 as well as the amount of money involved in the violations alleged in Counts 47 through 65.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982 (b), the defendants shall forfeit substitute property, up to the value of the amount described above, if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(Pursuant to Title 18, United States Code, Section 982(a)(1) and (a)(6).)

A TRUE BILL

FOREPERSON

PAUL J. McNULTY
UNITED STATES ATTORNEY

W. Neil Hammerstrom, Jr.
Assistant United States Attorney
Chief, Terrorism and National Security Unit

James P. Gillis
Assistant United States Attorney

John T. Morton
Assistant United States Attorney